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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,
Plaintiffs,

Civil No. 6:20-cv-01163-MK
(Lead Case)

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, JOEL D.
SHAPIRO AS ADMINISTRATOR OF THE
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY,

Defendants.

DECLARATION OF JANIS C.
PURACAL IN SUPPORT OF
PLAINTIFFS' POSITIONS IN THE
JOINT STATUS REPORT PURSUANT
TO DKT. NO 47

VIDOCQ SOCIETY,
Cross-Claimant,

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, JOEL D.
SHAPIRO AS ADMINISTRATOR OF THE
ESTATE OF DAVID E. HALL, VIDOCQ
SOCIETY, CITY OF COQUILLE, CITY OF
COOS BAY, and COOS COUNTY
Cross-Defendants.

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,
Plaintiffs,

Civil Case No. 3:21-cv-01719-MK
(Trailing Case)

v.

OREGON STATE POLICE,
Defendant.

I, Janis C. Puracal, declare as follows:

1. I am an attorney for Plaintiffs in the above-captioned case. I have personal knowledge of the following facts gained in my capacity as counsel.
2. Attached as Exhibit 1 is a true and correct copy of select pages from the Rule 30(b)(6) deposition of Defendant Vidocq Society.
3. Attached as Exhibit 2 is a true and correct copy of emails from Andrew Lauersdorf to Vidocq's Counsel, dated March 11 and June 24, 2024.
4. Attached as Exhibit 3 is a true and correct copy of select pages from Vidocq's Objections and Responses to Plaintiffs' Second Set of Requests for Production.

5. Attached as Exhibit 4 is a true and correct copy of select pages from the deposition of Defendant Mark Dannels.

6. Attached as Exhibit 5 is a true and correct copy of Plaintiffs' Response to Defendant Vidocq Society's First Set of Interrogatories and Requests for Production of Documents.

7. Attached as Exhibit 6 is a true and correct copy of Plaintiffs' Response to Defendant Vidocq Society's Second Set of Interrogatories and Requests for Production of Documents.

8. Attached as Exhibit 7 is a true and correct copy of select pages from Plaintiffs' Response to Defendant Kathy Wilcox First Set of Interrogatories.

9. Attached as Exhibit 8 is a true and correct copy of select pages from the deposition of Shaun McCrea.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

EXECUTED this 13th day of August, 2024.

MALONEY LAUERSDORF REINER PC

By /s/Janis C. Puracal

Janis C. Puracal, OSB #132288

E-Mail: jcp@mlrlegalteam.com

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2024, the foregoing DECLARATION OF JANIS C. PURACAL was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477 rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net <i>Attorneys for Defendants City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly McInnes</i>	Jesse B. Davis Todd Marshall Oregon Department of Justice 100 SW Market Street Portland, OR 97201 todd.marshall@doj.state.or.us jesse.b.davis@doj.state.or.us <i>Attorneys for Defendants Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox</i>
Anthony R. Scisciani III Kelsey L. Shewbert Meredith A. Sawyer Rachel Jones HWS Law Group 101 SW Main Street, Suite 1605 Portland, OR 97204 ascisciani@hwslawgroup.com kshewbert@hwslawgroup.com msawyer@hwslawgroup.com rjones@hwslawgroup.com <i>Attorneys for Defendant Vidocq Society</i>	Eric S. DeFreest Luvaas Cobb 777 High Street, Ste. 300 Eugene, OR 97401 edefreest@luvaascobb.com Laura E. Coffin Coffin Law 541 Willamette Street, Ste. 211 Eugene, OR 97401 lauracoffin@coffin.law <i>Attorneys for Defendant Richard Walter</i>

☒ by emailing to each of the foregoing a copy thereof to the email address above.

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